



**Service of Process  
Transmittal**

12/04/2020

CT Log Number 538696527

**TO:** Sue Carlson  
Target Corporation  
1000 Nicollet Mall  
Minneapolis, MN 55403-2542

**RE: Process Served in Illinois**

**FOR:** Target Corporation (Domestic State: MN)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** RITA JAEGER, Pltf. vs. TARGET CORPORATION and CASSONDRA GOMEZ, Dft.

**DOCUMENT(S) SERVED:** -

**COURT/AGENCY:** None Specified  
Case # 2020L012150

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Chicago, IL

**DATE AND HOUR OF SERVICE:** By Process Server on 12/04/2020 at 02:36

**JURISDICTION SERVED :** Illinois

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT has retained the current log, Retain Date: 12/04/2020, Expected Purge Date: 12/09/2020  
  
Image SOP  
  
Email Notification, Non Employee Litigation Target gl.legal@target.com

**SIGNED:** C T Corporation System  
**ADDRESS:** 1999 Bryan St Ste 900  
Dallas, TX 75201-3140

**For Questions:** 877-564-7529  
MajorAccountTeam2@wolterskluwer.com

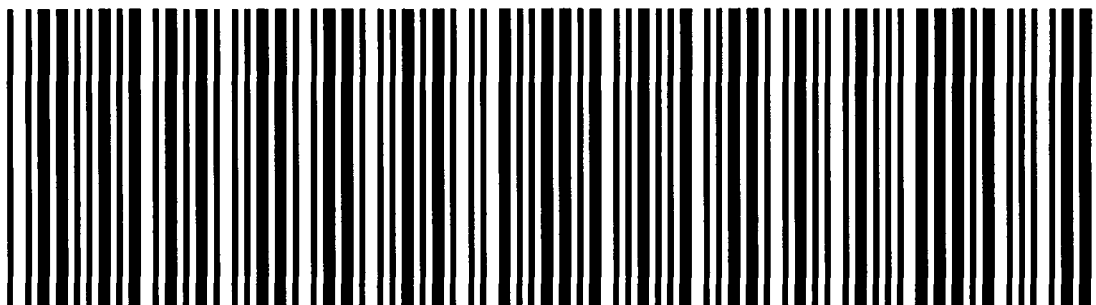


## PROCESS SERVER DELIVERY DETAILS

**Date:** Fri, Dec 4, 2020

**Server Name:** Sheriff Drop

Entity Served	TARGET CORPORATION
Agent Name	C T CORPORATION SYSTEM
Case Number	2020L012150
Jurisdiction	IL



2120 - Served  
 2220 - Not Served  
 2320 - Served By Mail  
 2420 - Served By Publication

2121 - Served  
 2221 - Not Served  
 2321 - Served By Mail  
 2421 - Served By Publication

\* 5 0 0 4 3 0 7 3 \*

SUMMONS

ALIAS SUMMONS

CCG-14

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 COUNTY DEPARTMENT, LAW DIVISION

RITA JAEGER,

Plaintiff,

v.

No. 2020 L 012150

TARGET CORPORATION, d/b/a TARGET  
 STORES, and CASSONDRA GOMEZ.

Defendants.

PLEASE SERVE:

Target Corporation  
 c/o Registered Agent: CT Corporation System  
 208 S. LaSalle St., Suite 814  
 Chicago, IL 60604

## SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer in this case, or otherwise file your appearance in the office of the clerk of this court (located in the Richard J. Daley Center, Room \* 801, Chicago, Illinois 60602) within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT, A COPY OF WHICH IS HERETO ATTACHED.

To the officer:

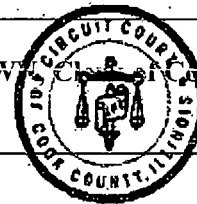
This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than 30 days after its date.

19th day of November, 2020

WITNESS, \_\_\_\_\_, 20\_\_\_\_

DOROTHY BROWN, Clerk of Court

Date of service: \_\_\_\_\_, 20\_\_\_\_



Name: Philip P. Terrazzino/Tomasik Kotin Kasserman, LLC  
 Attorney for: Plaintiff  
 Address: 161 North Clark Street, Suite 3050  
 City: Chicago, Illinois 60601  
 Telephone: (312) 605-8800  
 Atty. No.: 56323

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

\*Law Division Room 801  
 Chancery-Divorce Division Room 802  
 County Division Room 801  
 Probate Division Room 1202

EXHIBIT B

2120 - Served  
 2220 - Not Served  
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**SUMMONS**

2121 - Served  
 2221 - Not Served  
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\* 5 0 0 4 3 0 7 3 \*

**ALIAS SUMMONS**

CCG-14

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 COUNTY DEPARTMENT, LAW DIVISION**

RITA JAEGER,

Plaintiff,

v.

TARGET CORPORATION, d/b/a TARGET  
 STORES, and CASSONDRA GOMEZ.

Defendants.

No. 2020 L 012150

**PLEASE SERVE:**

**Target Corporation**  
**c/o Registered Agent: CT Corporation System**  
**208 S. LaSalle St., Suite 814**  
**Chicago, IL 60604**

**SUMMONS**

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WITNESS, \_\_\_\_\_, 20\_\_\_\_

DOROTHY BROWN, Clerk of Court

Date of service: \_\_\_\_\_, 20\_\_\_\_



**Name:** Philip P. Terrazzino/Tomasik Kotin Kasserman, LLC  
**Attorney for:** Plaintiff  
**Address:** 161 North Clark Street, Suite 3050  
**City:** Chicago, Illinois 60601  
**Telephone:** (312) 605-8800  
**Atty. No.:** 56323

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**DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**


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\*Law Division Room 801  
 Chancery-Divorce Division Room 802  
 County Division Room 801  
 Probate Division Room 1202

EXHIBIT B

Return Date: No return date scheduled  
Hearing Date: No hearing scheduled  
Courtroom Number: No hearing scheduled  
Location: No hearing scheduled

#56323 PPT/ew

\* 5 0 0 4 3 0 7 3 \*  
FILED  
11/12/2020 4:12 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

RITA JAEGER,

Plaintiff,

v.

TARGET CORPORATION, d/b/a TARGET  
STORES, and CASSONDRA GOMEZ.

Defendants.

No. 2020L012150

*Plaintiff Demands Trial by Jury*

11120759

COMPLAINT AT LAW

Plaintiff, RITA JAEGER, by her attorneys, TOMASIK KOTIN KASSERMAN,  
complaining of defendants, TARGET CORPORATION, d/b/a TARGET STORES; and  
CASSONDRA GOMEZ, states as follows:

COUNT I

TARGET - NEGLIGENCE – STRUCK BY THREE- TIER CART

1. On and before October 24, 2020, defendant, TARGET CORPORATION, owned, operated, controlled, managed, and/or maintained a certain premises known as Target located at 2241 Willow Road, Glenview, Cook County, Illinois.

2. On October 24, 2020, Plaintiff, RITA JAEGER, was on the premises shopping, when she was struck by a three-tier cart pushed by an agent and/or employee of TARGET CORPORATION.

3. At said time and place, defendant, TARGET CORPORATION, by and through its agent and/or employee, had a duty to use reasonable care in the ownership, operation, management, maintenance, and/or control of the subject premises.

4. At said time and place, defendant, TARGET CORPORATION, by and through its agent and/or employee, was negligent in one or more of the following ways:

- a. Struck Plaintiff, RITA JAEGER, with a cart;
- b. Pushed a cart without keeping a proper and sufficient lookout;
- c. Failed to exercise due care to avoid colliding with Plaintiff, RITA JAEGER;
- d. Failed to give warning prior to striking Plaintiff, RITA JAEGER, with a cart;
- e. Failed to properly train the employee and/or agent pushing the cart; and/or
- f. Failed to properly supervise the employee and/or agent pushing the cart.

5. As a proximate result of the foregoing, Plaintiff, RITA JAEGER, fell and sustained injuries and has incurred substantial medical bills and other economic damages, along with pain, suffering, loss of a normal life, disfigurement, and other non-economic damages.

WHEREFORE, Plaintiff, RITA JAEGER, demands judgment against defendant, TARGET CORPORATION, d/b/a TARGET STORES, in an amount in excess of the minimum amount required for jurisdiction in the Law Division of the Circuit Court of Cook County, Illinois.

## COUNT II

### CASSONDRA GOMEZ - NEGLIGENCE – STRUCK BY THREE- TIER CART

1. On and before October 24, 2020, defendant, CASSONDRA GOMEZ, as manager of TARGET CORPORATION, operated, managed, and maintained a certain premises known as Target located at 2241 Willow Road, Glenview, Cook County, Illinois.

2. On October 24, 2020, Plaintiff, RITA JAEGER, was on the premises shopping, when she was struck by a three-tier cart pushed by an employee and/or agent of TARGET CORPORATION.

3. At said time and place, defendant, CASSONDRA GOMEZ, had a duty to use reasonable care in the ownership, operation, management, maintenance, and/or control of the subject premises.

4. At said time and place, defendant, CASSONDRA GOMEZ , was negligent in one or more of the following respects:


- a. Failed to properly train the employee pushing the cart;
- b. Failed to direct the employee and/or agent on how to properly push a three-tier cart;
- c. Failed to properly supervise the employee and/or agent; and/or
- d. Failed to provide the employee and/or agent with policies and procedures regarding pushing a cart.

5. As a proximate result of the foregoing, Plaintiff, RITA JAEGER, fell and sustained injuries and has incurred substantial medical bills and other economic damages, along with pain, suffering, loss of a normal life, disfigurement, and other non-economic damages.

WHEREFORE, Plaintiff, RITA JAEGER, demands judgment against defendant, CASSONDRA GOMEZ, in an amount in excess of the minimum amount required for jurisdiction in the Law Division of the Circuit Court of Cook County, Illinois.

Shawn S. Kasserman  
Philip P. Terrazzino  
TOMASIK KOTIN KASSERMAN, LLC  
Attorneys for Plaintiff  
161 North Clark Street, Suite 3050  
Chicago, Illinois 60601  
(312) 605-8800  
(312) 605-8808 (f)  
Firm ID: 56323  
shawn@tkklaw.com  
phil@tkklaw.com

Philip P. Terrazzino



Return Date: No return date scheduled  
Hearing Date: No hearing scheduled  
Courtroom Number: No hearing scheduled  
Location: No hearing scheduled

#56323 PPT/ew

\* 5 0 0 4 3 0 7 3 \*  
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
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RITA JAEGER,

Plaintiff,

v.

TARGET CORPORATION, d/b/a TARGET  
STORES, and CASSONDRA GOMEZ.

Defendants.

No. 2020L012150

***Plaintiff Demands Trial by Jury***

11120759

**AFFIDAVIT**

I, PHILIP P. TERRAZZINO, under oath and subject to the penalties of perjury, depose and state that the damages sought in this cause exceed the sum of FIFTY THOUSAND DOLLARS (\$50,000.00).

Pursuant to 735 ILCS 5/1-109, the undersigned certified that the foregoing Affidavit is true and correct based upon the personal knowledge of the undersigned.

\_\_\_\_\_  
TOMASIK KOTIN KASSERMAN, LLC  
By: Philip P. Terrazzino

Shawn S. Kasserman  
Philip P. Terrazzino  
TOMASIK KOTIN KASSERMAN, LLC  
Attorneys for Plaintiff  
161 North Clark Street, Suite 3050  
Chicago, Illinois 60603  
(312) 605-8800  
(312) 605-8808 (f)  
Firm ID: 56323  
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EXHIBIT B